

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DEVELOPMENT SPECIALISTS, INC.,
in its capacity as Plan Administrator for
Coudert Brothers LLP,

Plaintiff,

v.

AKIN GUMP STRAUSS HAUER & FELD LLP,

Defendant.

No. 11-cv-05994 (CM)

DEVELOPMENT SPECIALISTS, INC.,
in its capacity as Plan Administrator for
Coudert Brothers LLP,

Plaintiff,

v.

ARENT FOX LLP,

Defendant.

No. 11-cv-05973 (CM)

DEVELOPMENT SPECIALISTS, INC.,
in its capacity as Plan Administrator for
Coudert Brothers LLP,

Plaintiff,

v.

DORSEY & WHITNEY LLP,

Defendant.

No. 11-cv-05995 (CM)

DEVELOPMENT SPECIALISTS, INC.,
in its capacity as Plan Administrator for
Coudert Brothers LLP,

Plaintiff,

v.

DUANE MORRIS LLP,

Defendant.

No. 11-cv-05969 (CM)

DEVELOPMENT SPECIALISTS, INC.,
in its capacity as Plan Administrator for
Coudert Brothers LLP,

Plaintiff,

v.

JONES DAY,

Defendant.

No. 11-cv-05974 (CM)

DEVELOPMENT SPECIALISTS, INC.,
in its capacity as Plan Administrator for
Coudert Brothers LLP,

Plaintiff,

v.

JONES DAY and SCOTT JONES,

Defendants.

No. 11-cv-05972 (CM)

DEVELOPMENT SPECIALISTS, INC.,
in its capacity as Plan Administrator for
Coudert Brothers LLP,

Plaintiff,

v.

JONES DAY and
GEOFFROY DE FOESTRAETS,

Defendants.

No. 11-cv-05968 (CM)

DEVELOPMENT SPECIALISTS, INC.,
in its capacity as Plan Administrator for
Coudert Brothers LLP,

Plaintiff,

v.

JONES DAY and
JINGZHOU TAO,

Defendants.

No. 11-cv-05970 (CM)

<p>DEVELOPMENT SPECIALISTS, INC., in its capacity as Plan Administrator for Coudert Brothers LLP,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>K&L GATES LLP,</p> <p style="text-align: center;">Defendant.</p>	No. 11-cv-05993 (CM)
<p>DEVELOPMENT SPECIALISTS, INC., in its capacity as Plan Administrator for Coudert Brothers LLP,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>MORRISON & FOERSTER LLP,</p> <p style="text-align: center;">Defendant.</p>	No. 11-cv-05985 (CM)
<p>DEVELOPMENT SPECIALISTS, INC., in its capacity as Plan Administrator for Coudert Brothers LLP,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>SHEPPARD MULLIN RICHTER & HAMPTON LLP,</p> <p style="text-align: center;">Defendant.</p>	No. 11-cv-05971 (CM)
<p>DEVELOPMENT SPECIALISTS, INC., in its capacity as Plan Administrator for Coudert Brothers LLP,</p> <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>DLA PIPER (US) LLP,</p> <p style="text-align: center;">Defendant.</p>	No. 11-cv-05983 (CM)

DEVELOPMENT SPECIALISTS, INC.,
in its capacity as Plan Administrator for
Coudert Brothers LLP,

Plaintiff,

v.

DECHERT LLP,

Defendant.

No. 11-cv-05984 (CM)

DECLARATION OF CLAIRE L. HUENE

Claire L. Huene hereby declares under penalty of perjury:

1. I am a member of Miller & Wrubel P.C., counsel for defendant Dechert LLP (“Dechert”). Dechert and all other law firm defendants (collectively, the “Law Firm Defendants”) in the above-referenced related actions are filing substantially similar motions for summary judgment pursuant to Rule 56(a) of the Federal Rules of Civil Procedure, including citing the same exhibits and unpublished authorities. I submit this Declaration to provide such exhibits and unpublished authorities in support of Dechert’s and all the other Law Firm Defendants’ respective motions for summary judgment.

2. Attached hereto as Exhibits A through M are the complaints against the Law Firm Defendants filed in the Bankruptcy Court in the above-referenced actions, in alphabetical order as follows: (A) Akin Gump Strauss Hauer & Feld LLP; (B) Arent Fox LLP; (C) Dechert LLP; (D) DLA Piper (US) LLP; (E) Dorsey & Whitney LLP; (F) Duane Morris LLP; (G) Jones Day; (H) Jones Day and Scott Jones; (I) Jones Day and Geoffroy de Foestraets; (J) Jones Day and Jingzhou Tao; (K) K&L Gates LLP; (L) Morrison & Foerster LLP; and (M) Sheppard Mullin Richter & Hampton LLC.

3. Attached hereto as Exhibit N is a copy of relevant portions of the Partnership Agreement of Coudert Brothers LLP ("Coudert"), dated December 30, 2004.

4. Attached hereto as Exhibit O is a copy of relevant portions of the First Amended Disclosure Statement Relating to First Amended Plan of Liquidation of Coudert Brothers LLP, dated May 9, 2008, filed in *In re Coudert Brothers LLP*, No. 06-12226 (Bankr. S.D.N.Y.) (RDD).

5. Attached hereto as Exhibit P is a copy of relevant portions of a transcript of a hearing in *In re Coudert Brothers* on April 3, 2009.

6. Attached hereto as Exhibit Q is a copy of the New York Supreme Court's decision in *Burke v. Clifton, Budd & DeMaria*, Index. No. 1454/91-002 (Sup. Ct. N.Y. County Dec. 9, 1991).

7. Attached hereto as Exhibit R is a copy of the New York Supreme Court's decision in *Burke v. Clifton, Budd & DeMaria*, Index. No. 1454/91-003 (Sup. Ct. N.Y. County July 27, 1992)

8. Attached hereto as Exhibit S is a copy of the New York Supreme Court's decision in *Mandel v. Grunfeld*, Index No. 3144/85 (Sup. Ct. N.Y. County Mar. 31, 1987).

9. Attached hereto as Exhibit T is a copy of the New York Supreme Court's decision in *Sheresky v. Sheresky Aronson Mayefksy & Sloan, LLP*, Index No. 150178/2010 (Sup. Ct. New York County Sept. 13, 2011).

Dated: December 9, 2011


CLAIRE L. HUENE